

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

JESSIE DE LEON, Individually and for
Others Similarly Situated,

v.

NORTHERN NATURAL GAS COMPANY

Case No. 21-mc-0042 (WMW/ECW)

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

JESSIE DE LEON, Individually and for
Others Similarly Situated,

v.

NORTHERN NATURAL GAS COMPANY

Case No. 7:20-cv-00179-DC-RG

Jury Trial Demanded

FLSA Collective Action

PLAINTIFF'S MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL

Plaintiff moves this Court for permission to proceed without local counsel pursuant to Local Rule 83.5(a)(2)(C) and Fed. R. Civ. P. 45(f). Undersigned counsel each certify the obligations and duties of counsel in the particular litigation will be fulfilled.

Plaintiff is represented by and Michael A. Josephson, Andrew W. Dunlap and Richard M. Schreiber of Josephson Dunlap LLP, and Richard J. (Rex) Burch of Bruckner Burch, PLLC. Both firms are located in Houston, Texas. Mr. Josephson, Mr. Dunlap, Mr. Schreiber, and Mr. Burch, all specialize in the representation of Plaintiffs in Fair Labor Standards Act (FLSA) collective actions, such as the claim brought in this case. All of these attorneys bring years of expertise in prosecuting FLSA collective actions to the representation of Plaintiff and the collective class in this matter.

Messrs. Josephson, Burch, Schreiber, and Mr. Dunlap each certify that they are familiar with the local civil court rules of this District. Therefore, administration of this case and of the Court's

docket will not be adversely affected by the absence of local counsel. Plaintiff respectfully requests that the Court grant him leave to proceed without local counsel.

Dated: August 23, 2021

Respectfully submitted,

By: /s/ Andrew W. Dunlap
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd of August, 2021, I electronically filed the document with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all known counsel of record.

/s/ Andrew W. Dunlap
Andrew W. Dunlap